

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Evelyn Class,)	
)	
Plaintiff,)	
)	
v.)	No:
)	
Regional Adjustment Bureau, Inc., a)	
Tennessee Corporation; Jones Wood,)	
Individually, and as Agent, Apparent Agent,)	
Servant, and/or Employee of Regional)	
Adjustment Bureau; and Agent Lisa,)	
Individually, and as Agent, Apparent Agent,)	
Servant, and/or Employee of Regional)	
Adjustment Bureau, Inc.)	
)	JURY DEMANDED
Defendants.)	

COMPLAINT AT LAW

NOW COMES the **Plaintiff, Evelyn Class**, by her Attorneys, Robert J. Semrad & Associates, L.L.C., and pursuant to this Complaint at Law, states the following against the above named **Defendants**, to wit: **Regional Adjustment Bureau, Inc.; Jones Wood; and Agent Lisa**:

JURISDICTION

1. The jurisdiction of the court is invoked pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA"). Venue is proper as the actions that give rise to this complaint occurred, **Plaintiff** resides, and **Defendants** conduct business within this District.

PARTIES

2. **Plaintiff, Evelyn Class** (hereinafter "**Plaintiff**"), is a natural person, a citizen of the County of Cook, State of Illinois, and United States of America, and is a "consumer" as that term is defined by 15 U.S.C. § 1692(a)(3).
3. Defendant, **Regional Adjustment Bureau, Inc.** (hereinafter, "**RAB**") is a Tennessee Corporation that conducts business in the Northern District of the State of Illinois, and is a "debt collector" as that term is defined by 15 U.S.C. § 1692(a)(6).
4. **Defendant, Jones Wood**, is a natural person doing business in the County of Cook, State of Illinois, United States of America, and is a "debt collector" as that term is defined by 15 U.S.C. § 1692(a)(6).
5. At all relevant times **Defendant, Jones Wood**, was the agent, apparent agent, servant and/or employee of **RAB** and was acting in the course scope of her agency, servitude and/or employment.
6. **Defendant, Agent Lisa**, is a natural person doing business in the County of Cook, State of Illinois, United States of America, and is a "debt collector" as that term is defined by 15 U.S.C. § 1692(a)(6).
7. At all relevant times **Defendant, Agent Lisa**, was the agent, apparent agent, servant and/or employee of **RAB** acting in the course scope of her agency, servitude and/or employment.

FACTUAL ALLEGATIONS

8. In 2008, **Plaintiff** incurred a debt to Seabank.
9. This debt was for personal use.
10. This debt was a "debt" as that term is defined by 15 U.S.C. § 1692(a)(5).
11. That thereafter, **Plaintiff** began to receive calls from **RAB'S** agents, apparent agents, servants, and/or employees attempting to collect on the aforementioned debt.

12. During these calls, **Plaintiff** informed said agents, apparent agents, servants, and/or employees of **RAB** of her bankruptcy and that she was represented by an attorney.

13. Some of the aforementioned calls were made by **Defendant, Jones Wood**, and were made to **Plaintiff's** place of employment.

14. One such call by **Defendant, Jones Wood**, was received by one of **Plaintiff's** co-workers at **Plaintiff's** place of employment.

15. During said call, said co-worker informed **Defendant, Jones Wood**, that **Plaintiff** was not allowed to accept personal calls at her place of employment.

16. Notwithstanding this information, **Defendant, Jones Wood**, and other agents, apparent agents, servants, and/or employees of **RAB** continued to place collection calls to **Plaintiff** at her place of employment, in violation of 15 U.S.C. §1692(c)(3).

17. During these calls, **Defendant** threatened **Plaintiff** negative credit reporting actions, was abusive, and made other threats to **Plaintiff**.

18. In July 2009, **Plaintiff** contacted **Defendant, Agent Lisa**, by telephone regarding the debt and the previous telephone calls to her place of employment.

19. During said phone call to **Defendant, Agent Lisa**, **Defendant, Agent Lisa** refused to give **Plaintiff**, her full name, in violation of 15 U.S.C. §1692

20. The aforementioned calls from **Defendants** to **Plaintiff** were collection communications in violation of numerous and multiple provisions of the FDCPA, as aforesaid.

21. As a direct and proximate result of the aforementioned actions, **Plaintiff** suffered injuries of a personal and pecuniary nature including, but not limited to: exacerbation of a pre-existing medical condition, anxiety, embarrassment, and emotional and physical harm.

22. As a result of **Defendants'** violations of the FDCPA, **Plaintiff** is entitled to actual damages pursuant to 15 U.S.C. § 1692k(a)(1); statutory damages in an amount up to \$1,000.00 per incident pursuant to 15 U.S.C. § 1692k(a)(2)(A), and reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1692k(a)(3) from **Defendants**.

WHEREFORE, Plaintiff prays that judgment be entered

- against **Defendants, RAB; Jones Wood; and Agent Lisa**, and in favor of **Plaintiff** for an award of actual damages pursuant to 15 U.S.C. § 1692k(a)(1);
- against **Defendants, RAB; Jones Wood; and Agent Lisa**, and in favor of **Plaintiff** for an award of statutory damages of \$1,000.00 pursuant to 15 U.S.C. §1692k(a)(2)(A);
- against **Defendants, RAB; Jones Wood; and Agent Lisa**, and in favor of **Plaintiff** for an award of costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C. § 1692k(a)(3); and;
- for any other such further relief as may be just and proper.

Respectfully Submitted,

/s/ Christian D. Elenbaas

Christian D. Elenbaas

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